

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

XX
Claude Galland; Violaine Galland; Paristudios.

Index # 14 CV 4411

Plaintiffs

**ADDENDUM TO
MOTION TO COMPEL USING
2 PHONES FOR THE EBT**

VS

James Johnston; Judith Johnston;
Stephen Bowden; Terri Bowden.

Defendants

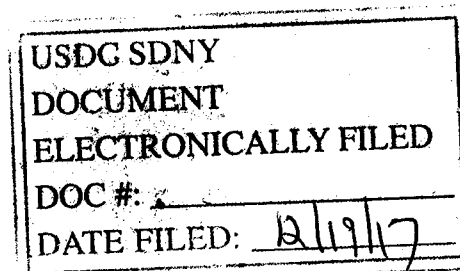
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To:

Honorable Judge Ellis.

**UNITED DISTRICT COURT
500 Pearl Street.**

New York



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SDNY PRO SE OFFICE
2017 DEC 19 AM 11:18
S.D. OF N.Y.

ADDENDUM and reply to defendants' answer to my MOTION to compel Lisa Porter the use of text & telephones to conduct the EBT

1) This is to notify the Court that my wife and I are stationed in Switzerland and the EBT will be conducted by phones in Switzerland # 011 – 41 3253 5589

My cell # 1 (917) 70 10 46. Please note that I NO LONGER USE MYCELL OTHER THAN FOR TEXT. CALLS ARE NOT ANSWERED AND MESSAGES ARE NOT HEARD. MY EMAIL IS:
Dr.ClaudeGalland@gmail.com

I have suggested on November 2nd the MOST REASONABLE OPERATION of using the cell to text the questions and the landline to hear my answers for a phone EBT that is solely granted to save travel's money to the defendants to New York when my wife and I were in New York.

However instead of acting in good faith and abide to my measured demand of using a hybrid of text and phone - this perjurious Attorney Lisa Porter, daughter of the defendants, is trying once again to wiggle out of this meritorious lawsuit by accusing me of not obeying the Court Order, a shark tactic used in her motion to dismiss with 12 counts of perjuries, in an attempt to pull a fast one on this Court.

But here a repeat of same shark tactic. To wit: in reply to the confusing response of the 11th hour *pro bono* attorney Paul Levy, it is apparent that he confused in black-letter who are the defendants and who are the Plaintiffs trying to be too smart by a half. If citizen make such basic confusion in science and technology, satellites will be falling on our heads. I have often repeated that a law degree is not a license to be careless.

In addition Paul Levy affirms outrageous false claim. The record speak for itself. The Court will note the time of the call in my photographs submitted to the Court in my Motion where it is incontrovertible I sent an IMMEDIATE text, followed by emails which I have diligently and in good faith made to the perjurious Lisa Porter, evidence that is frozen in the record. Records do not lie. Lying is endemic and systemic among younger attorneys and will continue unscathed as long as they enjoy absolute immunity.

We suffered almost 4 years of dilatory shark tactics orchestrated along desperate repeated dismissal attempts for this simple meritorious breach of contract. And there are more dismissal motion promised by Paul Levy. Such *ad finitum ad nauseum* fabrications, half-truths and flat perjuries weaved around endless motions to dismiss cannot serve Justice.

With infinite deference to this Court and most respectfully these attorneys should, even in this imperfect World, be respectfully sanctioned.

Claude Gaillard, *pro se*

12/18/2017

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

XX
Claude Galland; Violaine Galland; Paristudios.

Index # 14 CV 4411

Plaintiffs

**AFFIDAVIT OF SERVICE
ADDENDUM AND RELY TO
MOTION TO COMPEL USE
OF 2 PHONES FOR THE EBT**

VS

James Johnston; Judith Johnston;
Stephen Bowden; Terri Bowden.

Defendants

XX

This reply was sent by mail to the defendants.


Claude Galland